

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR 20 DEPOSITION ANSWERS  
# 1B FOR DEFENDANT LANCE SAGERS  
PURSUANT TO PED R. CIV P# 30(A)(2)  
IN ACCORDANCE TO THE HONORABLE JUDGE  
GREGORY M. SLEET'S FEB 21, 07 ~~MEMORANDUM~~  
MEMORANDUM P. 8

DATE : 3/12/07

FILED
MAR 14 2007
U.S. DISTRICT COURT DISTRICT OF DELAWARE

RGS/AM

Jimmie Lewis  
SB# 506622  
DEL. CORR. CENTER  
1181 PADDOCK RD  
SMYRNA, DEL 19971

- 1.) LANCE SAGERS WHAT IS YOUR SPECIFIC ACCOUNT OF WHAT OCCURRED AT THE D.P.C MITCHELL BUILDINGS DINNING HALL ON 6/14/04 AT OR ABOUT 8:00 PM ; REGARDING THE PLAINTIFF JIMMIE LEWIS
- 2.) LANCE SAGERS WHO WERE THE D.P.C PERSONNEL THAT ESCORTED THE PLAINTIFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 8:00 PM
- 3.) LANCE SAGERS WHAT IS THE DISCRIPTION OF YOUR JOB DUTIES.
- 4.) LANCE SAGERS HAVE YOU EVER HAD TO UTILIZE FORCE ON A PATIENT AT THE D.P.C

5.) LANCE SAGERS WHILE DR POSTER  
WAS EMPLOYED AT THE D.P.C  
DATING 5/21/04 TO 6/25/04  
DID SHE HAVE THE AUTHORITY  
TO ORDER YOU TO UTILIZE FORCE  
ON A PATIENT.

6.) LANCE SAGERS HAVE YOU EVER  
FILED GRIEVANCE(S) REGARDING  
THE DESCRIPTION OF YOUR JOB DUTIES  
AT THE D.P.C

\* CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS  
DUE HEREBY CERTIFY ON THIS 12<sup>th</sup>, DAY OF MARCH,  
2007, THAT I DID MAIL ONE TRUE AND CORRECT  
COPY OF THE MOTION FOR 20 DEPOSITION ANSWERS  
# 18 FOR DEFENDANT LANCE SAGERS PURSUANT  
TO FED R. CIV P# 30 (A)(2) IN ACCORDANCE TO  
THE HONORABLE JUDGE GREGORY M. SLEET'S FEB 21, 07  
ORDER, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)  
UNITED STATES DISTRICT COURT  
844 N. KING ST, LOCKBOX 18  
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH  
DEPUTY ATTORNEY GENERAL  
820 N. FRENCH ST, 11TH FL  
WILMINGTON, DELAWARE 19801

DATE : 3/12/07

Jimmie Lewis  
#81#506622  
DEL. CORR. CENTER  
1181 PADDICK RD  
SMYRNA, DEL 19977

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 04-1350(GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR LEAVE TO PROPOUND  
DISCOVERY NUMBER (1A), FROM AND  
FOR DEFENDANTS MOFFETT - GRAY -  
SAGERS AND JOHNSON , PURSUANT TO  
FED R. CIV P # 34 .

DATE : 3/12/07



Jimmie Lewis  
SB# 506622  
DEL. CORR. CENTER.  
1181 PADDOCK RD  
SMYRNA, DEL 19977

1.) THE WORK SCHEDULE DATING FROM  
5/21/04 TO 6/25/04 DURING THE  
COURSE OF THE PLAINTIFF'S STAY AT  
THE D.P.C. FOR THE FOLLOWING D.P.C.  
STAFF MEMBERS WHO THE DEFENDANTS  
MOFFETT - GRAY - SAGERS AND JOHNSON  
HAVE ASSERTED WILL BE WITNESS THEY  
CALL FOR AND OR INTEND TO UTILIZE  
DURING PRE TRIAL AND OR TRIAL  
PROCEDURES. ~~AND DETERMINE~~  
SAID DISCOVERY IS NEEDED FOR THE  
PURPOSE OF DETERMINING CREDIBILITY.  
SEE DEFENDANT'S RESPONSE TO PLAINTIFF'S  
MOTION FOR DISCOVERY # TIV PARAGRAPH  
NUMBER 11.  
PROVIDE WORK SCHEDULES FOR  
DR. SYLVIA FOSTER, DR. CHARLOTTE SELIG,  
NA MICHAEL ERICKSEN, RM KEN CREASEY, NURSE-  
HELEN HANLON, DIANE STACIOWSKI, FLORENCE S. -  
COBB, DAVE SAXTON, CLARENCE OATES, CURTIS -  
CORNISH, WILLIAM EVANS, DR. KATHERINE STENEMAN,  
AND NANCY ANDERSON.

- 2.) A, PHOTO COPY OF THE INSURANCE POLICY THAT THE D.P.C UTILIZES AND OR WAS BEING UTILIZED FOR THE DEFENDANTS MOFFETT - GRAY - SAGERS AND JOHNSON, FOR THE PURPOSE OF DETERMINING LIABILITY; ETC. DATING FROM 5/21/04 TO 6/25/04.
- 3.) A PHOTO COPY OF THE DEFENDANTS MOFFETT - SAGERS - GRAY - AND JOHNSON'S D.P.C JOB CONTRACT OF EMPLOYMENT. FOR THE PURPOSE OF FACTUALLY DETERMINING THEIR JOB DISCRIMPTIONS DATING FROM 5/21/04 TO 6/25/04 DURING THE COURSE OF THE PLAINTIFFS STAY AT THE D.P.C.  
( NOTE : AND OR EMPLOYEE APPLICATION . )
- 4.) THE FACT FINDING DOCUMENT UTILIZED IN FORMING THE UNSUBSTANTIATED DECISION REGARDING THE PLAINTIFF'S JUNE 20, 04 D.P.C GRIEVANCE REGARDING GRAY - MOFFET AND SAGERS

- 5.) MITCHELL BUILDINGS  
CLOSE OBSERVATION LOG SHEET(S)  
FOR 6/14/04, NEEDED TO CONFIRM  
OR DENY IF LANCE SAGERS WAS  
ASSIGNED TO ONE AND OR TWO PERSON  
CLOSE OBSERVATION OF ANY SPECIFIC  
PATIENT AT OR ABOUT 8:00 PM
- 6.) A PHOTO COPY OF DUTY ASSIGNMENT  
FOR ~~LANCE SAGERS~~ SAGERS  
FOR 6/14/04 AT THE D.P.C.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS  
DUE HEREBY CERTIFY ON THIS 12<sup>TH</sup>, DAY OF MARCH,  
2007, THAT I DID MAIL ONE TRUE AND CORRECT  
COPY OF THE MOTION FOR LEAVE TO PROPOUNDO  
DISCOVERY # 1A FROM AND FOR DEFENDANTS  
MOFFETT - GRAY - SAGERS AND JOHNSON  
PURSUANT TO FED R' CIV P# 34, BY U.S MAIL  
TO THE FOLLOWING:

CLERK OF THE COURT (GMS)  
UNITED STATES DISTRICT COURT  
844 N. KING ST, LOCKBOX 18  
WILMINGTON, DEL 19801

GREGORY E. SMITH  
DEPUTY ATTORNEY GENERAL  
820 N. FRENCH ST  
WILM, DEL 19801

DATE: 3/12/07

Jimmie Lewis  
SGI #506622  
DEL. CORR. CENTER  
1181 PAODOCK RD  
SMYRNA, DEL 19977



MAILED FROM ZIP CODE 19:

J/M: Timnit Kewo  
SBI# 506622 UNIT D42  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

*Clerk of the Court (GMS)*  
UNITED STATES DISTRICT COURT  
844 N. King St, Lock Box 18  
Wilmington, Delaware  
19801